UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 04-10353 PBS
	)	
VOICE SIGNAL TECHNOLOGIES, INC.,	)	
LAURENCE S. GILLICK, ROBERT S.	)	
ROTH, JONATHAN P. YAMRON, and	)	
MANFRED G. GRABHERR	)	
	)	
Defendants.	)	
	)	

SCANSOFT, INC.'S ASSENTED-TO MOTION FOR IMPOUNDMENT

Pursuant to Local Rule 7.2 and paragraph 14 of the parties' Protective Order, plaintiff

ScanSoft, Inc. moves for an order impounding ScanSoft's Sur-reply in Support of its Opposition

to Defendant Manfred G. Grabherr's Motion for Summary Judgment ("Sur-reply") and Exhibits

A and D through L of the Sur-reply, filed concurrently by hand. Exhibits B, C, and M to the Sur-

reply and a partially redacted copy of the Sur-reply are being filed concurrently electronically.

As grounds for the motion, ScanSoft states that Exhibit A contains the declaration of

Francis Ganong, which describes ScanSoft's proprietary speech recognition trade secrets, and

Exhibits D through L contain email correspondence designated "Highly Confidential" by VST.

Furthermore, the unredacted copy of the Sur-reply quotes from Exhibits A and D through L, and

thus contains highly confidential information.

Accordingly, pursuant to the terms of the Protective Order, ScanSoft moves that the

unredacted copy of the Sur-reply and Exhibits A and D through L of the Sur-reply be placed

under seal in the envelope provided and that impoundment continue pursuant to Local Rule 7.2
and the terms of the Protective Order.

CERTIFICATE PURSUANT TO CIVIL LOCAL RULE 7.1

I hereby certify that on July 21, 2005, counsel for the parties conferred and that counsel
for Dr. Grabherr assented to this motion.

Dated: July 21, 2005

SCANSOFT, INC.,
By its attorneys,

/s/ Rebecca L. Hanovice
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